U.S. DISTRICT COURT **WESTERN DISTRICT OF WISCONSIN** 

SEP 1 4 2022

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# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

**INDICTMENT** 

110

V.

JADE DEENY,

Case No.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)(1)(A)(i)

21 U.S.C. § 856(a)(1)

18 U.S.C. § 922(g)(1)

Defendant.

THE GRAND JURY CHARGES:

### COUNT 1

On or about June 6, 2022, in the Western District of Wisconsin, the defendant,

# JADE DEENY,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

#### COUNT 2

On or about June 6, 2022, in the Western District of Wisconsin, the defendant,

# JADE DEENY,

knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

### COUNT 3

On or about June 6, 2022, in the Western District of Wisconsin, the defendant,

## JADE DEENY,

knowingly and intentionally possessed with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

#### COUNT 4

On or about June 6, 2022, in the Western District of Wisconsin, the defendant, JADE DEENY,

knowingly and unlawfully possessed loaded firearms in furtherance of a drug trafficking crime, specifically, possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 3 of this indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)(i)).

#### COUNT 5

From in or about June 2022, in the Western District of Wisconsin, the defendant, JADE DEENY,

knowingly used and maintained a place, specifically, 627 Powell Street, La Crosse, La Crosse County, Wisconsin, for the purpose of distributing a controlled substance, specifically, cocaine, a Schedule II, controlled substance.

(In violation of Title 21, United States Code, Section 856(a)(1)).

## COUNT 6

On or about June 6, 2022, in the Western District of Wisconsin, the defendant, JADE DEENY,

knowing he had previously been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed in or affecting commerce a Diamondback Arms, Model DB-15 .556 rifle, said firearm having previously traveled in and affected interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

### FORFEITURE ALLEGATION

Upon conviction of the offenses in violation of Title 18, United States
Code, Sections 924(c)(1)(A)(i) and 922(g)(1) set forth in Counts 4 and 6 of this
indictment, the defendant,

## JADE DEENY,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. Taurus, Model G2C, 9 mm;
- b. SCCY, Model CPX-1, 9 mm;
- c. Ruger, Model P90, .45 caliber;
- d. Shooters Arms Manufacturing, .45 caliber;
- e. Diamondback Firearms, Model DB-15, .556 rifle;
- f. 28 rounds of Blazer 9 mm Luger ammunition;

g. 8 rounds of RP Luger 9 mm ammunition;

h. 50 rounds of Blazer 9 mm ammunition;

i. 30 rounds of Ammo 9 mm ammunition;

j. 19 rounds of Norma 9 mm Luger ammunition;

k. 603 rounds of .223 caliber ammunition;

1. 51 rounds of RP Luger 9 mm ammunition;

m. 55 rounds of 45 Full Metal Jacket ammunition;

n. 129 rounds of .45 caliber ammunition; and

o. 14 rounds of 45 Auto ammunition.

2. As result of the offense charged in Counts 1 and 5 of the indictment, the defendant,

## JADE DEENY,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), his right, title, and interest in all property constituting proceeds of the offenses charged in Counts 1 and 5, including but not limited to \$5,953 in United States currency.

A TRUE BILL

PRESIDING JUROR

Indictment returned: 09-14-2022

TIMOTHY M. O'SHEA United States Attorney